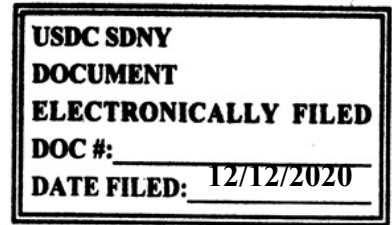


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



CITY OF ALMATY, KAZAKHSTAN and BTA  
BANK JSC,

Plaintiffs,

-against-

FELIX SATER, DANIEL RIDLOFF, BAYROCK  
GROUP INC., GLOBAL HABITAT SOLUTIONS,  
INC., RRMI-DR LLC, FERRARI HOLDINGS  
LLC, and MEM ENERGY PARTNERS LLC,

Defendants.

19 Civ. 2645 (AJN) (KHP)

**STIPULATION AND  
[PROPOSED] ORDER  
EXTENDING TIME TO  
RESPOND TO THE  
AMENDED COMPLAINT**

**WHEREAS**, on November 30, 2020, the Court granted in part and denied in part the motion to dismiss by Defendants Felix Sater (“Sater”), Daniel Ridloff (“Ridloff”), Bayrock Group Inc. (“Bayrock”), Global Habitat Solutions, Inc. (“GHS”) and RRMI-DR LLC (“RRMI”) (collectively, the “Answering Defendants”);

**WHEREAS**, the Answering Defendants’ time to answer is currently December 14, 2020;

**WHEREAS**, the deposition of Sater is currently scheduled for January 13, 2021; and

**WHEREAS**, the Answering Defendants’ have agreed to provide notice to Plaintiffs of the affirmative defenses they intend to raise in their answer before Sater is to be deposed, without prejudice to asserting additional defenses at the time the answer is filed, provided that Sater’s deposition may be reopened on the basis of newly asserted affirmative defenses and for the limited purpose of eliciting testimony related to such additional affirmative defenses;

**IT IS HEREBY STIPULATED AND AGREED**, by and between the Plaintiffs and the Answering Defendants, that the time for Answering Defendants to answer the First Amended Complaint dated August 30, 2019 is hereby extended to January 15, 2021.

This is the first extension of time requested by the Answering Defendants since the Court ruled on the Answering Defendants' motion to dismiss the Complaint.

Dated: New York, New York  
December 9, 2020


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Attorneys for the Answering Defendants

SO ORDERED:

  
\_\_\_\_\_  
Honorable Katharine H. Parker  
United States Magistrate Judge  
12/12/2020